

Chapter 7

Federal Facility Cleanups

Departments and agencies of the federal government manage a vast array of industrial activities at 27,000 installations. Due to the nature of such activities, whether they be federally or privately managed, installations may be contaminated with hazardous substances. All contaminated facilities are subject to CERCLA requirements.

Although federal facilities comprise only a small percentage of the community regulated under CERCLA, most federal facilities are larger and more complex than their private industrial counterparts. The corresponding complexity of federal facility clean-up activities presents unique management issues from the standpoint of compliance with environmental statutes. To address these issues, eight of the largest federal departments and agencies reported a combined budget of approximately \$8.4 billion in FY92 for environmental programs in air, drinking water, pesticides, Superfund, and other related areas.

7.1 FEDERAL FACILITY RESPONSIBILITY UNDER CERCLA

Federal departments and agencies responsible for facilities must conduct preliminary assessments (PAs), site inspections (SIs), and clean-up actions. To ensure federal facility compliance with CERCLA requirements, EPA not only provides advice and assistance, but takes enforcement action when appropriate.

Under state statutes, states also have a range of authority and enforcement tools available, in addition to those available under CERCLA, that can be used in addressing federal facility compliance with environmental regulations. Federal agency compliance can also be addressed by Indian tribes acting as either lead or support agencies for Superfund response activities.

7.1.1 Facility Responsibilities

Federal departments and agencies are responsible for identifying and addressing hazardous waste sites at the facilities that they own or operate. They are required under CERCLA to comply during site cleanup with all provisions of federal environmental statutes and regulations, as well as all applicable state and local requirements. Federal facilities track their compliance status to generate the information needed to comply with the reporting requirements.

7.1.2 EPA'S Oversight Role

EPA works through the Office of Federal Facilities Enforcement (OFFE) in the Office of Enforcement to assist federal agencies with clean-up activities. EPA responsibilities include assisting in and ultimately concurring with remedy selection, providing technical advice and assistance, reviewing federal agency pollution abatement plans, and resolving disputes regarding noncompliance. To fulfill these responsibilities, EPA relies on personnel from Headquarters, Regional offices, and states.

Acronyms Referenced in Chapter 7	
CERCLIS	CERCLA Information System
CERFA	Community Environmental Response Facilitation Act
DOD	Department of Defense
DOE	Department of Energy
DOI	Department of Interior
FFER	Federal Facilities Environmental Restoration
GSA	General Services Administration
IAG	Interagency Agreement
MOU	Memorandum of Understanding
NPL	National Priorities List
OFFE	Office of Federal Facilities Enforcement
ORD	Office of Research and Development
PA	Preliminary Assessment
POGO	Privately Owned, Government Operated
RA	Remedial Action
RCRA	Resource Conservation and Recovery Act
RD	Remedial Design
RI/FS	Remedial Investigation/Feasibility Study
SI	Site Inspection
TIO	Technology Innovation Office

To track the status of federal facilities, EPA uses a number of information systems. The Facility Index System provides an inventory of federal facilities subject to environmental regulations. Through the CERCLA Information System (CERCLIS), EPA maintains a comprehensive list of all reported potentially threatening hazardous waste sites, including federal facility sites. The list of federal facilities contaminated with hazardous waste is made available to the public through the Federal Agency Hazardous Waste Compliance Docket and through docket updates published in the *Federal Register*.

7.1.3 The Role of States and Indian Tribes

Under CERCLA Section 120(f), for federal facility sites on the National Priorities List (NPL), state and local governments are encouraged to participate in the planning and selection of remedial actions taken by federal agencies in that state or local community. State and local government participation includes, but is not limited to, reviewing applicable data and developing studies, reports, and action plans. EPA encourages states to become signatories to the interagency agreements (IAGs) that federal agencies must enter into with EPA under CERCLA

Section 120(e)(2). State participation in the CERCLA cleanup process is carried out as set forth in CERCLA Section 121.

Cleanups at federal facility sites that are not on the NPL are also carried out by the federal agency that owns or operates the site. These cleanups are subject to state laws regarding removal and remedial actions in addition to CERCLA. Therefore, a state's role at a non-NPL federal facility site will be determined by the state's clean-up laws, as well as by CERCLA.

CERCLA Section 126 mandates that federally recognized Indian tribes be "afforded substantially the same treatment" as states with regard to most CERCLA provisions. Therefore, a qualifying Indian tribe would have a substantially similar role in federal facility cleanups as a state. Qualifying tribes must be federally recognized; have a tribal governing body that is currently performing governmental functions to promote health, safety, and welfare of the affected population; and have jurisdiction over a site.

7.2 PROGRESS AT FEDERAL FACILITY SITES

OFFE, in conjunction with various other Headquarters offices, Regional offices, and states, ensures federal department and agency compliance with CERCLA and Resource Conservation and Recovery Act (RCRA) requirements. The compliance status of federal facilities is tracked on the Federal Agency Hazardous Waste Compliance Docket. The docket contains information regarding federal facilities that manage hazardous waste or from which hazardous substances have been released.

In recent years, the number of federal facilities listed on the docket and on the NPL, which are those having highest priority for remediation under Superfund, has increased. To distinguish the increasing number of federal facility from non-federal NPL sites, EPA published Update 12 of the NPL in February 1992, listing federal facility and non-federal sites separately. This distinction helps to clarify responsibility at federal facility sites.

As CERCLA Section 120(e)(2) requires, and to facilitate cleanup, EPA negotiates IAGs at each federal facility site listed on the NPL. IAGs document clean-up activities, formalize the schedule of activities, and establish mechanisms for resolving disputes.

To keep Congress and the public informed of remedial progress at federal facility sites, CERCLA Section 120(e)(5) requires that each federal department and agency, including EPA, furnish an annual report to Congress on progress toward implementing CERCLA at its facilities. EPA's annual report is provided in Section 7.4.

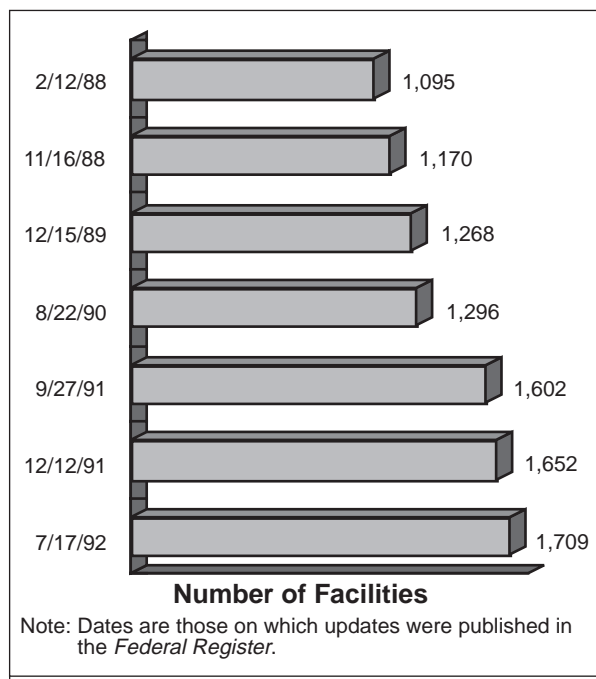
7.2.1 Federal Agency Hazardous Waste Compliance Docket

Federal facilities that have areas contaminated with hazardous substances are identified on the Federal Agency Hazardous Waste Compliance Docket, which was established under CERCLA Section 120(c). The docket functions as a comprehensive record of the federal facilities Superfund program. Information submitted to EPA on identified facilities is compiled and maintained in the docket. This information is then made available to the public.

On February 12, 1988, the initial federal agency docket was published in the *Federal Register*. At that time, 1,095 federal facilities were listed. Exhibit 7.2-1 shows the increase in the number of sites on the docket since its first publication. During FY92, a total of 211 sites were added to the docket and 104 sites were removed in docket updates on December 12, 1991 and July 17, 1992. (Facilities are removed from the docket for such reasons as incorrect reporting of hazardous waste activity or transfer from federal ownership.)

The July 17, 1992 update of the docket listed a total of 1,709 facilities. Of these sites, the Department of Defense (DOD) owned and/or operated 814 (48 percent) and the Department of the Interior (DOI) owned and/or operated 420 (25 percent). The

**Exhibit 7.2-1
Number of Federal Facilities on the
Hazardous Waste Compliance Docket**



Source: Federal Agency Hazardous Waste Compliance Docket.

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remainder were distributed among 18 other federal departments, agencies, and instrumentalities. A breakdown of facilities on the docket, by federal department or agency, is illustrated in Exhibit 7.2-2.

In FY92, EPA added privately owned, government-operated facilities (POGOs) to the docket for the first time. The statutory basis for POGO inclusion has existed since the enactment of SARA and was specifically addressed by EPA in 1992. CERCLA Section 120(c) requires that the docket contain information submitted under RCRA Sections 3005, 3010, and 3016 and CERCLA Section 103. These sections impose duties on operators and owners of facilities. All facilities that have contaminated areas and are operated by the federal government are subject to these sections, whether or not they are government-owned.

**Exhibit 7.2-2
Distribution of Federal Facilities
on the Hazardous Waste Compliance
Docket**

Department of Defense	814	(48%)
Department of the Interior	420	(25%)
Department of Agriculture	93	(5%)
Department of Energy	76	(4%)
Department of Transportation	69	(4%)
United States Postal Service	39	(2%)
Tennessee Valley Authority	38	(2%)
Veterans Administration	28	(2%)
Civil Corps of Engineers	27	(2%)
General Services Administration	22	(1%)
Department of Justice	17	(1%)
Environmental Protection Agency	17	(1%)
National Aeronautics and Space Administration	16	(1%)
Department of Commerce	12	(0.7%)
Department of Health and Human Services	7	(0.4%)
Department of the Treasury	6	(0.4%)
Department of Labor	2	(0.1%)
Department of Housing and Urban Development	2	(0.1%)
Ownership Not Yet Determined	2	(0.1%)
Central Intelligence Agency	1	(0.06%)
Small Business Administration	1	(0.06%)
TOTAL	1,709	

Note: Percentages total less than 100% due to rounding.

Source: Federal Agency Hazardous Waste Compliance Docket and Office of Enforcement/Office of Federal Facilities Enforcement.

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7.2.2 Progress Toward Cleaning Up Federal Facilities on the NPL

Update 12 of the NPL, published in February 1992, was the first NPL update to distinguish federal facility sites from non-federal sites. The update contains language that clarifies the roles of EPA and other federal departments and agencies with regard to federal facility sites. EPA is not the lead agency for federal facility sites on the NPL; federal agencies are lead agencies for their facilities. EPA is, however, responsible for overseeing federal facility compliance with CERCLA.

There were 125 federal facility sites on the NPL as of the end of FY92, including 116 final sites and 9 proposed sites. During FY92, six federal facilities were proposed for listing on the NPL, but no additional federal facility sites were listed as final sites.

Federal departments and agencies made substantial progress during FY92 toward cleaning up federal facility NPL sites. Activity at federal facility NPL sites during the year included starting approximately 100 remedial investigation/feasibility studies (RI/FSs), 40 remedial designs (RDs), and 30 remedial actions (RAs) and signing 46 records of decision.

7.2.3 Federal Facility Agreements Under CERCLA Section 120

IAGs comprise the cornerstone of the enforcement program addressing federal facility NPL sites. During FY92, 12 CERCLA IAGs were executed to accomplish hazardous waste cleanup at federal facility NPL sites. Of the 116 final federal facility sites listed on the NPL, 104 were covered by enforceable agreements by the end of the fiscal year.

IAGs between EPA and the responsible federal department or agency document some or all of the phases of remedial activity (RI/FS, RD, RA, operation and maintenance) to be undertaken at a federal facility NPL site. States are sometimes signatories to these agreements. IAGs formalize the procedure and timing for submittal and review of documents and include a schedule for remedial activities, in accordance with the requirements of CERCLA Section 120(e). They also establish mechanisms to resolve any disputes between the signatories. Furthermore, EPA can assess stipulated penalties under these agreements.

IAGs must comply with the public participation requirements of CERCLA Section 117 and are enforceable by the states. Citizens may enforce the agreements through civil suits. Penalties may be imposed by the courts against federal departments and agencies in successful suits brought by states or citizens for failure to comply with IAGs.

EPA took precedent-setting action in federal facility enforcement under an IAG during FY92. As part of the Hanford tri-party agreement, the Department of Energy (DOE) agreed to complete construction and initiate operation of a low-level mixed waste laboratory on or before January 31, 1992. On October 31, 1991, DOE requested that this schedule be changed. EPA and the State of Washington initially denied the request, but, after negotiating, the parties reached agreement on the dispute. As a result, DOE agreed to seek funding for expedited response actions at Hanford and to construct and operate an on-site laboratory significantly smaller than originally proposed. The agreement allows DOE one year to demonstrate that low-level mixed waste laboratory needs can be satisfied using a combination of an existing commercial laboratory and the downsized on-site laboratory that was under construction by the end of FY92. EPA and the state assessed DOE a \$100,000 penalty for noncompliance with the original agreement.

7.3 FEDERAL FACILITY INITIATIVES

The growing awareness of environmental contamination at federal facilities has increased the public demand for facility cleanup. EPA has worked to establish priorities for clean-up programs in order to maximize cleanups with the finite resources available. In FY92, OFFE focused on priority issues including military base closure, acceleration of federal facility cleanups, interagency forums to address issues, and innovative technologies for cleanup.

7.3.1 Base Closure

During FY92, 69 military installations, not including residential facilities, were scheduled to be closed under the 1988 and 1990 base closure acts, (Public Law 100-526 and Part A of Public Law 101-510). Of these installations, 15 were on the NPL.

The base closure acts provide for the closure and realignment of installations due to revised military force needs. Bases slated for closure frequently

include land and facilities suited for non-military use. This leads to pressure for the expeditious transfer of military property to non-federal interests for economic development. Many of the military installations contain contaminated areas, however, and CERCLA sets strict standards to prevent the transfer of property contaminated by hazardous substances.

During FY92, EPA worked to meet both economic and environmental goals for base closures. Building on the efforts of the Defense Environmental Response Task Force, a multi-agency group formed by Congress to examine the environmental issues associated with base closure, OFFE's Base Closure Workgroup and DOD worked to identify and implement solutions to base closure issues. In a February 1992 memorandum, EPA announced its position for balancing the protection of human health and the environment with making property available for reuse at closing installations. The memorandum identified the point in the remediation process at which EPA felt that a transfer by deed could occur. On October 19, 1992, Congress passed and the President signed the Community Environmental Response Facilitation Act (CERFA), amending CERCLA to provide for property transfers at a point comparable to that advocated by EPA. Accordingly, under CERFA, property may be transferred while long-term ground-water remedial action continues.

In June 1992, the combined efforts of EPA, DOD, and the State of California produced guidance for identifying property that is environmentally suitable for transfer. The document, *DOD Guidance on the Environmental Review Process to Reach a Finding of Suitability to Transfer*, outlines consulting roles for EPA and the state during DOD determinations. The transfer criteria address EPA's concern for the cleanup of base areas posing an environmental threat while supporting DOD's efforts to identify base areas that have near-term reuse potential. EPA reexamined this guidance in light of the concurrence role that Congress gave the Agency under CERFA. In addition, EPA began reviewing procedures DOD had proposed for leasing or transferring title of remediated parcels.

On the Regional and state levels, EPA and DOD co-sponsored conferences to foster improved communication among DOD, EPA, states, and other interested parties on clean-up facilitation, redevelopment of closing bases, and issue resolution. Conference participants met to discuss acceleration initiatives, risk management, real estate transfer and redevelopment, remediation technologies, and development of standardized techniques for cleanups at closing military bases. During FY92, conferences were held in Sacramento, California, and Boston, Massachusetts. The information exchanged at the conferences will have direct and immediate application to cleanup and redevelopment.

7.3.2 Accelerated Cleanups at Federal Facilities

OFFE developed draft guidance to identify components of the Superfund Accelerated Clean-Up Model that provide opportunities for speeding cleanup at federal facilities on the NPL. The guidance addresses site assessment, the impact of accelerated cleanup on the NPL, presumptive remedies, early and long-term actions, public participation, and the effect of accelerated cleanup on existing federal facility IAGs. As of the end of FY92, the draft guidance was undergoing Regional review.

7.3.3 Interagency Forums

During the year, EPA worked in conjunction with other federal departments and agencies to develop national policy and define environmental restoration issues at federal facilities.

Federal Facilities Clean-Up Leadership Council

To lead nationwide efforts in cleaning up federal facilities, EPA established the Federal Facilities Clean-Up Leadership Council, consisting of representatives from EPA Headquarters, Regional program offices, and Offices of Regional Counsel. At its quarterly meetings, the council serves as a

forum for generating national policy and guidance; addressing technical, enforcement, and strategic planning issues; and developing a team approach toward making the federal facilities clean-up program a model of success.

Federal Facilities Environmental Restoration Dialogue Committee

In April 1992, EPA established the Federal Facilities Environmental Restoration (FFER) Dialogue Committee as an advisory committee under the Federal Advisory Committee Act. The committee provides a forum for identifying and redefining issues related to environmental restoration activities at federal facilities. The goal of the committee is to develop consensus on recommendations for improving the process by which federal facility environmental restoration decisions are made.

During the year, the FFER Dialogue Committee made substantial progress toward an interim report that will describe methods for improving the process by which federal agencies share information and involve affected parties in decision making. Through the procedures outlined in the interim report, the FFER Dialogue Committee will seek to create an open, public, interactive process that originates at the local or facility level and extends through the entire federal hierarchy of departments, agencies, and offices that are part of the Executive Branch decision-making process. The committee's recommendations are intended to institutionalize the consultative process and provide an outline of the procedures and ground rules necessary for the equitable involvement of all parties. Recommendations include creating site-specific advisory boards and developing information dissemination policies. The interim report will explicitly address priority setting in the event of a funding shortfall.

7.3.4 Innovative Technology Development

OFFE, in conjunction with the Technology Innovation Office (TIO) and the Office of Research

and Development (ORD), worked toward establishing federal facilities as development and field research centers for applying innovative technologies for source reduction, pollution control, site investigation, and site remediation.

EPA, the State of California, the Air Force, and private firms established a "public-private partnership project" to measure the performance of select technologies. McClellan Air Force Base in California was the first site used in this project, for demonstrating remediation technologies. Information discovered through the project is ultimately expected to lower costs, reduce clean-up times, and increase clean-up efficiency at federal and private sites.

OFFE and TIO explored the use of other federal and private sites for similar partnership projects. In 1992, OFFE and TIO supported an Air Force initiative to use bioventing for remediating subsurface contamination from jet fuel spills. The Air Force developed a protocol for the conditions and use of the bioventing technology, a biological treatment system that uses the injection of atmospheric air to treat contaminated soil. The protocol received a favorable review from ORD's Risk Reduction Engineering Laboratory. To encourage the review and consideration of the Air Force protocol and the potential application of bioventing for site remediation, OFFE and TIO distributed a memorandum to all EPA Regions. As of the end of FY92, the Air Force proposed bioventing for 55 sites around the nation.

In other FY92 activity, EPA signed a joint implementation plan for a memorandum of understanding (MOU) with DOE, DOD, DOI, and the Western Governors Association to examine issues and technology needs for environmental restoration and waste management in western states. Reports generated under the MOU identify barriers to technology development and address the need for a cooperative approach when developing technical solutions to environmental restoration and waste management problems. OFFE will continue to coordinate this project for EPA until a committee is formed in compliance with the Federal Advisory Committee Act, and site-specific technology projects are proposed and implemented.

7.4 CERCLA IMPLEMENTATION AT EPA FACILITIES

Of the 1,709 sites on the Federal Agency Hazardous Waste Compliance Docket at the end of FY92, 17 were EPA-owned. None of these EPA-owned sites were listed on the NPL. Clean-up progress at these 17 facilities, as required by CERCLA Section 120(e)(5), is described below.

7.4.1 Requirements of CERCLA Section 120(e)(5)

CERCLA Section 120(e)(5) requires an annual report to Congress from each federal department, agency, or instrumentality on its progress in implementing Superfund at its facilities. Specifically, the annual report to Congress is to include, but need not be limited to, each of the following items:

- *Section 120(e)(5)(A)*: A report on the progress in reaching IAGs under CERCLA Section 120(e)(2);
- *Section 120(e)(5)(B)*: The specific cost estimates and budgetary proposals involved in each IAG;
- *Section 120(e)(5)(C)*: A brief summary of the public comments regarding each proposed IAG;
- *Section 120(e)(5)(D)*: A description of the instances in which no agreement (IAG) was reached;
- *Section 120(e)(5)(E)*: A progress report for conducting RI/FSs required by CERCLA Section 120(e)(1) at NPL sites;
- *Section 120(e)(5)(F)*: A progress report for remedial activities at sites listed on the NPL; and
- *Section 120(e)(5)(G)*: A progress report for response activities at facilities that are not listed on the NPL.

CERCLA also requires that the annual report contain a detailed description, on a state-by-state basis, of the status of each facility subject to this

section. The status report must include a description of the hazards presented by each facility, plans and schedules for initiating and completing response actions, enforcement status (where applicable), and an explanation of any postponement of or failure to complete response actions.

EPA has given high priority to maintaining compliance with CERCLA requirements at its own facilities. To ensure concurrence with all environmental statutes, EPA uses its environmental compliance program to heighten regulatory awareness, identify potential compliance violations, and coordinate appropriate corrective action schedules at its laboratories and other research facilities.

EPA has also instituted an environmental auditing program of EPA facilities to identify potential regulatory violations of federal (including CERCLA), state, and local statutes. By performing these detailed facility analyses, EPA is better able to assist its facilities in complying with environmental regulations.

7.4.2 Progress in Cleaning Up EPA Facilities Subject to Section 120 of CERCLA

At the end of FY92, the Federal Agency Hazardous Waste Compliance Docket listed 17 EPA-owned facilities, including one site added to the docket and two sites removed from the docket during the fiscal year. The National Air and Radiation Environmental Laboratory in Montgomery, Alabama, was added to the docket, and the Environmental Photographic Interpretation Center in Warrenton, Virginia, and the Anguilla Landfill in Fredericksted, Virgin Islands, were deleted.

EPA is required to report on progress in meeting Section 120 requirements at EPA-owned sites for reaching IAGs, conducting RI/FSs at NPL sites, and undertaking response activities at NPL and non-NPL sites.

- EPA did not have any facilities listed on the NPL as of FY92; therefore, EPA has not entered into

any IAGs for remediation requiring reporting under CERCLA Sections 120(e)(5)(A), (B), (C), or (D).

- Because no EPA-owned sites are listed on the NPL, EPA has not undertaken any RI/FSs or remedial actions at NPL sites that would require reporting under CERCLA Sections 120(e)(5)(E) and (F).
- EPA has evaluated and, as appropriate, undertaken response activities at all 17 EPA sites on the docket. Exhibit 7.4-1 provides state-by-state status for EPA-owned sites and identifies the types of problems and progress of activities at each site, as required by CERCLA Section 120 (e)(5)(G).

EPA facilities that have undergone significant response activities in FY92 are discussed in detail below.

National Air and Radiation Environmental Laboratory, Alabama

EPA's air and radiation laboratory formerly operated at a site near its current location at Gunter Air Force Base in Montgomery, Alabama. During operations at the original site, waste solvents, including xylene and benzene, were discharged into a pit adjacent to the laboratory building. The releases were identified through EPA's internal auditing program. In conjunction with the Underground Injection Control Program of the Alabama Department of Environmental Management, EPA is working to determine the extent of the resulting contamination and to develop an appropriate mitigation program. The Agency is monitoring the ground-water wells on the property regularly and initiating a program to pump ground water from the contaminated area. EPA is also evaluating the use of biological remediation to address any residual contamination.

EPA Central Regional Laboratory, Maryland

EPA conducted an on-site investigation of ground-water contamination at the EPA Central

Exhibit 7.4-1
Status of EPA Facilities on the Federal Agency
Hazardous Waste Compliance Docket

State	EPA Facility	Known or Suspected Problems	Project Status
AL	National Air and Radiation Environmental Laboratory (formerly known as the Eastern Environmental Radiation Facility (EERF))	Contained soil and ground-water contamination	PA completed; ongoing monitoring and remediation activities.
AR	Combustion Research Facility	No contamination	PA completed 4/89; no further remedial action planned.
CO	National Enforcement Investigation Center	No contamination	PA completed 4/88; no further remedial action planned.
FL	Environmental Research Laboratory	No contamination	PA completed 4/88; no further remedial action planned.
IL	Region 5 Environmental Services Division Laboratory	No contamination	PA completed 4/88; no further remedial action planned.
KS	EPA Mobil Incinerator	No contamination from mobile incinerator	No further remedial action planned; mobile incinerator removed from site.
KS	Region 7 Environmental Services Division Laboratory	No contamination	PA completed 4/88; no further remedial action planned.
MD	EPA Central Regional Laboratory	No contamination	PA completed 4/88. SI completed; monitoring of site ongoing.
MI	Motor Vehicle Emission Laboratory	No contamination	PA conducted 3/90; no further remedial action planned.
NC	EPA Tech Center	No contamination	PA conducted 8/91; no further remedial action planned.
NJ	EPA Raritan Depot	No contamination that poses a threat to the environment	PA/SI prompted additional investigative work currently underway.
OH	AWBERC Facility	No contamination	PA completed 4/88; no further remedial action planned.
OH	Center Hill Hazardous Waste Engineering Research Laboratory	No contamination	PA completed 4/88; no further remedial action planned.
OH	Testing and Evaluation Facility	No contamination	PA completed 4/88; no further remedial action planned.
OR	EPA Laboratory	Small-quantity generator	Conditionally exempt from PA requirements.
TX	EPA Laboratory	Small-quantity generator	Conditionally exempt from PA requirements.
WA	Region 10 Environmental Services Division Laboratory	Minor contamination attributable to DOD ownership	PA/SI prompted additional investigative work. Currently undergoing Hazard Ranking System scoring.

Source: Hazardous Waste Compliance Docket and the Office of Administration and Resources Management.

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Regional Laboratory in Annapolis, Maryland. Although the State of Maryland is satisfied that hazardous substances have not been released into the environment and that further response action is not required, the Agency continues to maintain monitoring wells at the site.

EPA Raritan Depot, New Jersey

Originally, the Raritan Depot site was owned by DOD and used for munitions testing and storage. In 1961, the General Services Administration (GSA) took possession of the property and, in 1988, transferred 165 acres to EPA. Although residual contamination from past DOD and GSA activities at the facility persists, EPA has not stored, released, or disposed of any hazardous substances on the property.

Site investigation work occurred in FY91, following the discovery of a contaminated surface-water impoundment. The investigation has resulted in the implementation of interim clean-up actions. Response activities have included spraying a rubble pile containing asbestos with a bituminous sealant;

removing the liquid in the surface impoundment, excavating soil, installing a liner, and backfilling the impoundment with clean material; excavating and storing munitions; and removing underground storage tanks. EPA expects that DOD will pursue additional clean-up work at the site.

Region 10 Environmental Services Division Laboratory, Washington

EPA acquired the property from the Department of the Navy and used the land to construct an environmental testing laboratory. The property adjacent to the laboratory contains a rubble landfill that was covered by the Navy. The soil cover on the landfill has begun to deteriorate, exposing construction material. Initial sampling performed at the site revealed the presence of hazardous substances in surface-water run off. Additional sample collection and analysis was conducted to facilitate an evaluation using the Hazard Ranking System. Headquarters and Regional staff are evaluating this information to determine required action.